

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

KENNETH L. HOLLAND,)
)
Plaintiff,)
)
v.) C. A. No. 05-464-SLR
)
)
STANLEY TAYLOR, et al.,)
)
Defendants.)

**DEFENDANTS' SECOND REQUEST FOR
PRODUCTION OF DOCUMENTS AND THINGS**

Pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure, Defendants, through their undersigned counsel, hereby serve on Plaintiff, Kenneth Holland, the following Requests for Production of Documents and Things.

INSTRUCTIONS

- A. If any document or thing required to answer any Request for Production is withheld because you claim that such information is privileged or is contained in a privileged document or communication:
- (1) identify each such document with sufficient specificity to permit a court to determine the propriety of the asserted privilege and setting forth the nature of the document;
 - (2) identify the privilege and set forth the factual basis for the privilege claims; and
 - (3) set forth each Request to which each such document or thing is responsive.
- B. These Requests for Production are continuing in nature and, if applicable, will require supplemental responses pursuant to Rule 26(e) of the Federal Rules of Civil Procedure.

REQUESTS FOR PRODUCTION

REQUEST NO. 1:

1. All grievances, complaints, or other correspondence relating to, regarding or arising out of the incidents alleged in Plaintiff's Complaint relating to Sgt. Wilbur Justice, Counselor Kent Raymond and Counselor Theresa DeMarco, including, but not limited to, all grievances or complaints submitted by Plaintiff to Department of Correction personnel, responses thereto, and any related correspondence between Plaintiff and Department of Correction personnel.

REQUEST NO. 2:

2. All correspondence relating to, regarding or arising out of the incidents alleged in Plaintiff's Complaint relating to Sgt. Wilbur Justice, Counselor Kent Raymond and Counselor Theresa DeMarco, including, but not limited to, any correspondence between friends or family members of Plaintiff or other inmates and Department of Correction personnel.

REQUEST NO. 3:

3. Any statements, declarations, petitions, or affidavits relating to, regarding or arising out of the incidents alleged in Plaintiff's Complaint relating to Sgt. Wilbur Justice, Counselor Kent Raymond and Counselor Theresa DeMarco and any statements, declarations, or affidavits of Plaintiff, other inmates, or witnesses to the allegations in the Complaint.

REQUEST NO. 4:

4. All medical records for Plaintiff relating to, regarding or arising out of the incidents alleged in Plaintiff's Complaint relating to Sgt. Wilbur Justice, Counselor Kent

Raymond and Counselor Theresa DeMarco.

5. REQUEST NO. 5:

5. All documents identified or referenced in Plaintiff's Response to Defendants' Second Set of Interrogatories, served contemporaneously herewith.

**DEPARTMENT OF JUSTICE
STATE OF DELAWARE**

/s/ Catherine Damavandi
Catherine Damavandi (ID # 3823)
Deputy Attorney General
Delaware Department of Justice
820 N. French Street, 6th Floor
Wilmington, DE 19801
(302) 577-8400
Attorney for State Defendants

DATE: January 4, 2008

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Plaintiff,)
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CERTIFICATE OF SERVICE

I hereby certify that on January 4, 2008, I electronically filed *Defendants' Second Request for Production* with the Clerk of Court using CM/ECF. I hereby certify that on January 4, 2008, I have mailed by United States Postal Service, the document to the following non-registered party: Kenneth Holland.

/s/ Catherine Damavandi
Catherine Damavandi (ID # 3823)
Deputy Attorney General
Delaware Department of Justice
820 N. French Street, 6th Floor
Wilmington, DE 19801
(302) 577-8400
Attorney for State Defendants

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